

# **EXHIBIT 3**

Lopez, Lidia  
L.C., a minor v. State of California

UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA

L.C., a minor by and through her  
guardian ad litem Maria Cadena,  
individually and as  
successor-in-interest to Hector Puga;  
I.H., a minor by and through his  
guardian ad litem Jasmine Hernandez,  
individually and as  
successor-in-interest to Hector Puga;  
A.L., a minor by and through her  
guardian ad litem Lydia Lopez,  
individually and as  
successor-in-interest to Hector Puga;  
and ANTONIA SALAS UBALDO,  
individually,

CASE NO.  
5:22-cv-00949  
-KK-(SHKx)

Plaintiffs,

vs.

STATE OF CALIFORNIA; COUNTY OF  
SAN BERNARDINO; S.S.C., a nominal  
defendant; ISAIAH KEE;  
MICHAEL BLACKWOOD; BERNARDO RUBALCAVA;  
ROBERT VACCARI; JAKE ADAMS;  
and DOES 6-10, inclusive,

Defendants.

VIDEOTAPED  
ZOOM DEPOSITION OF LIDIA LOPEZ  
WEDNESDAY, DECEMBER 4, 2024  
2:05 P.M.

REPORTED BY: VICTORIA FRENCH, CSR NO. 14193

A P P E A R A N C E S

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FOR THE DEFENDANTS STATE OF CALIFORNIA, BY AND  
THROUGH CALIFORNIA HIGHWAY PATROL AND MICHAEL  
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ALSO PRESENT:

-BLAKE JONES, Legal Videographer

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I N D E X

WITNESS: LIDIA LOPEZ

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1 WEDNESDAY, DECEMBER 4, 2024, 2:05 P.M.

2 - - -

3 THE VIDEOGRAPHER: Good afternoon. This  
4 is the video deposition of Lidia Lopez, taken  
5 remotely on Wednesday, December 4th, 2024, in the  
6 matter of L.C. et al. versus State of California,  
7 County of San Bernardino, Case Number  
8 5:22-cv-00949-KK-(SHKx). This case is being heard  
9 in the United States District Court in the Central  
10 District of California.

11 My name of Blake Jones, legal  
12 videographer, contracted through Dean Jones Legal  
13 Videos, Incorporated, Los Angeles and Santa Ana,  
14 California. Since we're not in person today, the  
15 videographer might have to interrupt the proceedings  
16 if the deponent drifts out of frame or we have any  
17 connectivity issues. This deposition is commencing  
18 at 2:05 p.m.

19 Would all present please identify  
20 themselves, beginning with the deponent?

21 THE WITNESS: Lidia Lopez.

22 MS. GUSTAFSON: Shannon Gustafson for the  
23 San Bernardino County Defendants.

24 MS. ESQUIVEL: Diana Esquivel on behalf of  
25 the State of California, Officer -- California

1 Highway Patrol Officers Kee, Blackwood, and  
2 Rubalcava, appearing from Sacramento.

3 MS. LE: Hang Le on behalf of the deponent  
4 Lidia Lopez and the Plaintiffs.

5 THE VIDEOGRAPHER: Court reporter, please  
6 administer the oath.

7 - - -

8 LIDIA LOPEZ,  
9 having first declared under penalty of  
10 perjury to tell the truth, was examined  
11 and testified as follows:

12 -EXAMINATION-

13 BY MS. GUSTAFSON:

02:06:01 14 Q. Will you please state and spell your full  
02:06:03 15 name for the record?

02:06:04 16 A. Yes. Lidia Lopez, L-i-d-i-a, L-o-p-e-z.

02:06:15 17 Q. Have you ever gone by any other name other  
02:06:17 18 than Lidia Lopez?

02:06:18 19 A. No.

02:06:19 20 Q. Have you ever had your deposition taken  
02:06:19 21 before?

02:06:20 22 A. No.

02:06:21 23 Q. Since this is a new process to you, I'm  
02:06:23 24 just going to go ahead and explain some of the  
02:06:27 25 ground rules. I'm sure you had an opportunity to

03:16:00 1 Q. Did he ever see -- now, you would  
03:16:02 2 communicate with him regularly on Facebook; right?

03:16:06 3 A. Yeah. Here and there.

03:16:07 4 Q. Did you ever see any Facebook posts from  
03:16:10 5 him about how he had just gotten out of jail?

03:16:13 6 A. I don't think so.

03:16:23 7 Q. When you said that you had heard around  
03:16:25 8 that he had been in jail, did you know that at the  
03:16:28 9 time you were in a relationship with him, or is that  
03:16:31 10 something you heard later?

03:16:32 11 A. Can you repeat the question, please?

03:16:34 12 Q. You had said that you had heard around,  
03:16:36 13 people talking that he had been in jail.

03:16:39 14 Was that something you knew when you  
03:16:41 15 started your relationship with him, or was that  
03:16:43 16 something you found out about later?

03:16:46 17 A. Oh, no. That was something probably in  
03:16:51 18 2008 or 2009, not near when we were together.

03:16:59 19 Q. Were you aware that he was on probation  
03:17:01 20 when he was with you?

03:17:03 21 A. Not that I recall.

03:17:06 22 Q. Did he ever talk to you about being on  
03:17:08 23 probation?

03:17:09 24 A. No.

03:17:20 25 Q. When you were with Hector, did he drink a

03:17:22 1 lot?

03:17:23 2 A. He liked to drink here and there.

03:17:26 3 Q. What do you mean by here and there?

03:17:28 4 A. He'll have a beer. If I'm cooking, he  
03:17:30 5 will be like, "Oh, can I have a beer?" And he'll  
03:17:33 6 have one or two.

03:17:37 7 Q. Did you ever see him drunk?

03:17:39 8 A. I didn't personally see him drunk.

03:17:49 9 Q. Did his mom ever tell you that she was  
03:17:52 10 worried about how much he drank?

03:17:56 11 A. No.

03:18:02 12 Q. Did Hector ever talk to you at all about  
03:18:04 13 the fact that he was in jail?

03:18:06 14 A. He didn't talk to me about it. I mean, he  
03:18:09 15 didn't like me knowing anything, so I didn't ask.  
03:18:12 16 If he didn't tell me, I didn't ask.

03:18:14 17 Q. When you say he didn't like you knowing  
03:18:17 18 anything, like, what do you mean?

03:18:19 19 A. Like, if he was in prison or -- he didn't  
03:18:21 20 like me asking him questions, so I just stayed away  
03:18:24 21 from it.

03:18:28 22 Q. Did he ever tell you what his opinions  
03:18:31 23 were on law enforcement?

03:18:34 24 A. No.

03:18:44 25 Q. After you brought Allyson home from the



03:18:48 1 hospital those four days that Hector came to visit,  
03:18:52 2 did he ever drink anything when he was at your  
03:18:55 3 house?

03:18:55 4 A. No.

03:18:58 5 Q. Did you ever learn that he was out  
03:19:01 6 drinking on Monday night, February 15th?

03:19:07 7 A. No.

03:19:11 8 Q. Did you ever communicate with his sister  
03:19:14 9 Nancy or Gabriela?

03:19:16 10 A. Yes.

03:19:17 11 Q. And how often did you talk to them?

03:19:20 12 A. Here and there, I'll give them a call.

03:19:25 13 Q. Did you ever learn that he had been pulled  
03:19:30 14 over for drinking and driving on February 15th,  
03:19:34 15 2021?

03:19:36 16 A. No.

03:19:38 17 Q. Did Nancy ever share with you that the  
03:19:41 18 police pulled them over when she was in the car with  
03:19:46 19 him?

03:19:47 20 A. 2020 -- you're talking about --

03:19:51 21 Q. After Allyson was born.

03:19:53 22 A. After Allyson was born, no.

03:19:57 23 Q. Did anybody ever tell you that before the  
03:20:00 24 night he was shot that he had driven away when  
03:20:05 25 police tried to pull him over?

DECLARATION UNDER PENALTY OF PERJURY

I, the undersigned, declare under penalty of perjury that I have read the entire foregoing transcript of my deposition or the same has been read to me, and the same is true and accurate, save and except for changes, corrections, additions, or deletions indicated by me on the DEPOSITION ERRATA SHEET hereof, with the understanding that I offer these changes as if still under oath.

Signed on the \_\_\_\_\_ day of \_\_\_\_\_,  
20\_\_\_\_, at \_\_\_\_\_, \_\_\_\_\_.  
(City) (State)

\_\_\_\_\_  
LIDIA LOPEZ

1 I, Victoria French, CSR No. 14193, certify:  
2 that the foregoing proceedings were taken before me  
3 at the time and place herein set forth; at which  
4 time the witness was duly sworn; and that the  
5 transcript is a true record of the testimony so  
6 given.

7 Witness review, correction and signature was

8 (X) by Code. ( ) requested.

9 ( ) waived. ( ) not requested.

10 ( ) not handled by the deposition officer due to  
11 party stipulation.

12 The dismantling, unsealing, or unbinding of  
13 the original transcript will render the reporter's  
14 certificate null and void.

15 I further certify that I am not financially  
16 interested in the action, and I am not a relative or  
17 employee of any attorney of the parties, nor of any  
18 of the parties.

19  
20 Dated this 14th day of January, 2025

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25  
Victoria French